

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

CASE NO.: 1-24-cv-00547-JMB-PJG

LOREN OWENS,

Plaintiff,

v.

ADROIT HEALTH GROUP, LLC, *et.al.*,

Defendant.

**DEFENDANT ADROIT HEALTH GROUP, LLC'S
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSE TO PLAINTIFF'S COMPLAINT [D.E. 1]**

Defendant Adroit Health Group, LLC ("Adroit"), by and through the undersigned attorneys and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) hereby requests entry of an Order granting an extension of time to file its response to the Complaint [D.E. 1] filed by Plaintiff Loren Owens ("Plaintiff") up to and including Tuesday, August 27, 2024, as agreed to by Plaintiff, and in support thereof, states as follows:

1. On May 23, 2024, Plaintiff filed her Complaint against Adroit. *See D.E. 1.*
2. On May 29, 2024, the undersigned executed a Waiver of the Service of Summons, making Adroit's response to Plaintiff's Complaint due on or before July 29, 2024. *See D.E. 6.*
3. On July 30, 2024, the Court entered an Order granting Adroit's Motion for Extension of Time to Respond to Complaint making Adroit's response to Plaintiff's Complaint due on or before August 13, 2024. *See D.E. 11.*
4. In the interest of efficiency and preserving judicial and party resources, Adroit requests an additional extension of time to allow Adroit sufficient time to investigate Plaintiff's

claims and allegations in order to fully and accurately file a response to Plaintiff's Complaint. Here, Plaintiff filed a Complaint which includes 16 causes of action consisting of 287 allegations (not including subparts). Moreover, there are documents in Adroit's possession that need to be fully analyzed before filing its response to Plaintiff's Complaint.

5. Counsel for Plaintiff and counsel Adroit met and conferred regarding the requested extension, and Plaintiff agreed to an extension of time for Adroit to respond to the Complaint up to and including Tuesday, August 27, 2024.

6. Federal Rule of Civil Procedure 6(b)(1)(A) provides, in pertinent part, that "when an act may or must be done within a specified time, the court may, for good cause, extend the time . . . with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires." Fed. R. Civ. P. 6(b)(1)(A).

7. Here, the instant Motion is being filed prior to the deadline to file a response to Plaintiff's Complaint and Adroit has established good cause for the requested extension of time. Accordingly, in light of the foregoing and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Adroit respectfully requests up to and including Tuesday, August 27, 2024, as agreed to by Plaintiff, to file a response to Plaintiff's Complaint.

8. Plaintiff will not suffer any prejudice as a consequence of this unopposed request. This brief extension of time is being sought in good faith and not for the purposes of delay or other improper purpose. Adroit anticipates that this will be the last extension necessary to respond to Plaintiff's Complaint.

WHEREFORE, Defendant Adroit Health Group, LLC, respectfully requests this Court enter an Order granting the instant Unopposed Motion for Extension of Time up to and including Tuesday, August 27, 2024, to file a response to Plaintiff's Complaint, together with such further

and other relief in favor of Adroit as this Court deems just and proper.

Dated: August 13, 2024.

Respectfully submitted,

By: /s/ Jamey R. Campellone
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Attorneys for Defendant, Adroit Health Group, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of August 2024, a copy of the foregoing Unopposed Motion for Extension to Time was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

By: /s/ Jamey R. Campellone
JAMEY R. CAMPELLONE